

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

MICHAEL MACKO AND)	
DISASTER MITIGATION)	
COMPANY,)	
)	
Plaintiffs,)	
)	
vs.)	Civil Action No. 1:10-cv-00424-TDS
)	
DISASTER MASTERS, INC. and)	
RON ALFORD)	
)	
Defendants.)	

**MOTION BY DANIEL R. TAYLOR, JR. AND CHAD D. HANSEN TO
WITHDRAW AS COUNSEL FOR DEFENDANTS**

Daniel R. Taylor, Jr. and Chad D. Hansen, pursuant to L.R. 83.1(e), respectfully move the Court for an Order allowing their withdrawal and the withdrawal of Kilpatrick Stockton LLP from the above-captioned matter as counsel for Defendants Disaster Masters, Inc. (“Disaster Masters”) and Ron Alford (“Mr. Alford”). In support of this motion, the undersigned show the Court as follows:

1. On June 7, 2010, Daniel R. Taylor, Jr. and Chad D. Hansen, attorneys in the Winston-Salem, North Carolina office of Kilpatrick Stockton LLP, made appearances on behalf of Defendants Disaster Masters and Mr. Alford in the above-captioned matter. [See Doc. 17, Doc. 18.]

2. On or about August 2, 2010, Mr. Alford, on behalf of himself and as the founder, sole shareholder, and current Chief Executive Officer of Disasters Masters,

communicated in writing to the undersigned that Defendants no longer wished to be represented by the undersigned or by Kilpatrick Stockton LLP. Thereafter, the undersigned assisted Defendants in identifying and retaining substitute counsel.

3. On August 6, 2010, attorney B. Ervin Brown, II appeared as counsel of record for Defendants in this action. [See Doc. 33.] Mr. Brown will continue to serve as counsel for Defendants.

4. Defendants consent to the withdrawal of the undersigned as counsel.

5. Withdrawal will not affect any pretrial deadlines or trial date, and will not result in any prejudice to the parties as Defendants are still represented by competent counsel that is fully capable of representing the interests of Defendants.

6. On August 17, 2010, the undersigned gave notice by email to all three counsel of record for Plaintiffs that the undersigned would be seeking to withdraw as counsel and requested Plaintiffs' consent. Approximately twenty-four hours later, after receiving neither a response to the request nor any indication that Plaintiffs' counsel was out of the office or otherwise unavailable, the undersigned informed Plaintiffs' counsel that they intended to file their motion to withdraw by the close of business on August 18. The undersigned also informed counsel that if the undersigned did not hear from counsel, the undersigned would inform the Court that they had asked for Plaintiffs' consent but had not heard from Plaintiffs' counsel. Later on August 18, Neil C. Jones, counsel for Plaintiffs, communicated to the undersigned, "That is fine," which the undersigned interpret to mean that Plaintiffs consent to the motion to withdraw; otherwise, Mr. Jones'

statement would seem to suggest that the undersigned should represent to the Court that they had not heard from him when they in fact had heard from him, which Mr. Jones certainly could not have intended.

WHEREFORE, Daniel R. Taylor, Jr., and Chad D. Hansen respectfully move the Court for an order granting their withdrawal and the withdrawal of Kilpatrick Stockton LLP as counsel for Defendants and removing them from future CM/ECF notices in this action.

Respectfully submitted this the 19th day of August, 2010.

/s/ Daniel R. Taylor, Jr.

Daniel R. Taylor, Jr.

NC State Bar No. 7358

Chad D. Hansen

NC State Bar No. 32713

KILPATRICK STOCKTON LLP

1001 West Fourth Street

Winston-Salem, NC 27101-2400

Telephone: (336) 607-7300

Facsimile: (336) 607-7500

E-mail: dantaylor@kilpatrickstockton.com

E-mail: chadhansen@kilpatrickstockton.com

*Attorneys for Defendants Disaster Masters, Inc. and
Ron Alford*

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Ashley B. Summer	ashley.summer@nelsonmullins.com
B. Ervin Brown, II	beb@ervinbrownlaw.com
Neil C. Jones	neil.jones@nelsonmullins.com
Paul J. Osowski	paul.osowski@nelsonmullins.com

and I hereby certify that I have mailed the document to the following non CM/ECF participants: None.

/s/ Daniel R. Taylor, Jr.

Daniel R. Taylor, Jr.

NC State Bar No. 7358

KILPATRICK STOCKTON LLP

1001 West Fourth Street

Winston-Salem, NC 27101-2400

Telephone: (336) 607-7300

Facsimile: (336) 607-7500

E-mail: dantaylor@kilpatrickstockton.com

*Attorney for Defendants Disaster Masters, Inc.
and Ron Alford*